

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ENTRUST, INC.,

Plaintiff-  
Counterdefendant,

v.

OPEN SOLUTIONS INC.,

Defendant –  
Counterclaimant.

C. A. No. 07-098-GMS

**ANSWER OF PLAINTIFF – COUNTERDEFENDANT ENTRUST, INC.  
TO COUNTERCLAIMS OF DEFENDANT- COUNTERCLAIMANT  
OPEN SOLUTIONS INC.**

For its Answer to the Counterclaims, Plaintiff-Counterdefendant Entrust, Inc. (“Entrust” or “Plaintiff”), by its undersigned attorneys, herein responds to the numbered paragraphs of Defendant-Counterclaimant Open Solutions Inc.’s (“Open Solutions” or “Defendant”) Counterclaims upon information and belief as follows. Unless expressly admitted, all responses of Plaintiff Entrust to Defendant’s Counterclaims should be deemed denied.

1. Entrust admits the allegations in Paragraph 1.
2. Entrust admits the allegations in Paragraph 2.
3. Entrust admits this Court has subject matter jurisdiction over claims for patent infringement arising under the laws of the United States.
4. Entrust admits that venue is proper in this District.
5. Entrust admits the allegations in Paragraph 5.
6. Entrust admits the allegations in Paragraph 6.

7. Entrust admits that Defendant has denied that it has infringed U.S. Patent No. 5,712,627 (“the ‘627 patent”).

8. Entrust admits that Defendant has pled as a third affirmative defense that “the ‘627 patent is invalid on the grounds that the purported invention fails to meet the conditions of patentability specified in 35 U.S.C. § 101 *et seq.*”

9. Paragraph 9 contains conclusions of law, rather than averments of fact, to which no answer is required, but insofar as an answer is deemed necessary, Entrust admits there is a dispute over infringement.

10. Paragraph 10 contains conclusions of law, rather than averments of fact, to which no answer is required, but insofar as an answer is deemed necessary, Entrust denies the averments of fact in Paragraph 10.

11. Paragraph 11 contains conclusions of law, rather than averments of fact, to which no answer is required, but insofar as an answer is deemed necessary, Entrust denies the averments of fact in Paragraph 11.

### **AFFIRMATIVE DEFENSES**

Entrust also asserts upon information and belief the following affirmative defenses:

#### **First Affirmative Defense**

The ‘627 Patent is valid and enforceable.

#### **Second Affirmative Defense**

Defendant’s Counterclaims fails to state a claim upon which relief can be granted.

Entrust presently has insufficient knowledge or information upon which to form a belief as to whether it may have additional, yet unstated, affirmative defenses. As such, Entrust reserves the right to assert additional affirmative defenses in the event that discovery indicates that additional affirmative defenses are appropriate.

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Dated: June 4, 2007

  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

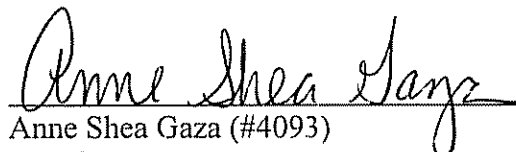
**CERTIFICATE OF SERVICE**

I hereby certify that, on June 4, 2007, I caused to be sent by hand delivery and electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

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I hereby certify that on June 4, 2007, the foregoing document was sent via Federal Express to the following non-registered participants in the manner indicated:

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